

### REMARKS

Claims 1, 19, 20, 36, and 54 are amended. Claims 15, 34, 50, and 68 are cancelled. No claims are added. Claims 1-14, 16-33, 35-49, 51-67, and 69-71 are pending in the application. The amendments to the claims as indicated herein do not add any new matter to this application.

### CLAIM REJECTIONS—35 U.S.C. § 103

#### CLAIMS 1-12, 15-31, 34-47, 50-56, 68-71

Claims 1-12, 15-31, 34-47, 50-56, and 68-71 were rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Kumhyr (U.S. Publication No 2003/0041251 A1) in view of Wood et al. (U.S. Patent 6,944,761), hereinafter "Wood". This rejection is respectfully traversed.

Claim 1 recites in part “determining whether the password meets quality criteria; ... wherein the user is associated with a particular user role, and wherein determining whether the password meets quality criteria comprises determining whether the password meets quality criteria for the particular user role.” Neither Kumhyr nor Wood, individually or in combination, suggests or discloses the quoted features.

Neither of the cited references even discusses quality criteria for user roles, much less determining whether a password meets quality criteria for a particular user role that a user is associated with.

The Office Action analogizes (page 8) the "user role" of Claim 1 to a "target application" in Kumhyr. This is incorrect, and a skilled person at the time of the invention would not have read Kumhyr in that way. The abstract of Kumhyr, lines 4-5, discusses "an application (i.e. a program or function such as voice mail, e-mail, online banking, etc.)". Such an application (or "target application") of Kumhyr, which may be a program or function (as discussed in the abstract of Kumhyr), cannot be a “user role” as claimed under **any** interpretation of the claims.

One of ordinary skill in the art, properly interpreting the claims in light of the specification, would not consider that a target application of Kumhyr suggests or discloses the user role recited in Claim 1.

Kumhyr describes receiving an easily remembered preferred word from a user (see abstract), but Kumhyr fails to suggest that that a user takes on the role of the target application of that the user is accessing. Indeed, such a modification of Kumhyr would make no technical sense whatsoever.

Further, the cited references do not discuss quality criteria at all, much less determining whether a password meets quality criteria for a particular user role that a user is associated with, as recited in Claim 1.

Kumhyr describes checking a "word" for compliance with a password format specification. However, a "word" in Kumhyr is not a password—in fact Kumhyr plainly distinguishes between the word and a password in a format specification. Nonetheless, even according to the Office Action's forced analogy, checking a word for compliance with a target application in Kumhyr does not suggest or disclose determining whether the password meets quality criteria, as recited in Claim 1. Checking against a password format specification may allow for poor quality passwords that are nonetheless properly formatted according to the password format specification. Thus, Kumhyr describes a completely different approach than the claims.

For the reasons discussed above, the cited references do not suggest or disclose determining whether the password meets quality criteria, wherein the user is associated with a particular user role, and wherein determining whether the password meets quality criteria comprises determining whether the password meets quality criteria for the particular user role, as recited in Claim 1.

Independent claims 19, 20, 36, and 54 each recites the features of claim 1 that distinguish claim 1 from the cited art as discussed above. Therefore, each of claims 19, 20, 36 and 54 is also allowable over the cited art for the same reasons set forth above for claim 1.

Reconsideration is respectfully requested.

#### CLAIMS 13, 32, 48, 66

Claims 13, 32, 48, and 66 were rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Kumhyr in view of Hurley (U.S. Publication No. U.S. 20040250139 A1), hereinafter “Hurley”. This rejection is respectfully traversed.

Claims 13, 32, 48, and 66 each depends from an independent claim. Claims 13, 32, 48, and 66 therefore each inherits the features of the independent claim from which the claim depends. The Office Action does not even allege that Hurley suggests or discloses the distinguished features of the independent claims. Claims 13, 32, 48, and 66 are therefore each patentable for the same reasons as the independent claim from which the claim depends. The rejections of 13, 32, 48, and 66 are respectfully traversed. Reconsideration is respectfully requested.

#### CLAIMS 14, 33, 67

Claims 14, 33, and 67 were rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Kumhyr (U.S. Publication No 2003/0041251 A1) in view of Casco-Arias et al., (U.S. Patent Publication No. U.S. 2004/0250141), hereinafter “Casco-Arias”. This rejection is respectfully traversed.

Claims 14, 33, and 67 each depends from an independent claim. Claims 14, 33, and 67 therefore each inherits the features of the independent claim from which the claim depends. The Office Action does not even allege that Casco-Arias suggests or discloses the distinguished features of the independent claims. Claims 14, 33, and 67 are therefore each patentable for the same reasons as the independent claim from which the claim depends. The rejections of Claims 14, 33, and 67 are respectfully traversed. Reconsideration is respectfully requested.

#### REMAINING CLAIMS

The pending claims not discussed so far are dependant claims that depend on an independent claim that is discussed above. Because each of the dependant claims include the features of claims upon which they depend, the dependant claims are patentable for at least those reasons the claims upon which the dependant claims depend are patentable. Removal of the

rejections with respect to the dependant claims and allowance of the dependant claims is respectfully requested. In addition, the dependent claims introduce additional features that independently render them patentable. Due to the fundamental differences already identified, a separate discussion of those features is not included at this time.

#### CONCLUSION

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. The Office is authorized to charge any applicable fee that is missing or insufficient to our Deposit Account No. 50-1302.

Respectfully submitted,

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